

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

DOMINION GREENTREE, LLC,

Plaintiff,

vs.

**HARFORD MUTUAL INSURANCE
COMPANY, and FIRSTLINE NATIONAL
INSURANCE COMPANY,**

Defendants.

Case No.: _____

NOTICE OF REMOVAL

The above-named Defendants, Harford Mutual Insurance Company (hereinafter “Harford”) and Firstline National Insurance Company (hereinafter “Firstline”), hereinafter “Defendants,” pursuant to 28 U.S.C. § 1441, *et seq.*, for their Notice of Removal of the action instituted by the above-named Plaintiff against them as Defendants, show unto the Court:

1. Plaintiff is a Tennessee Limited Liability Company duly organized and is a citizen and resident of Knox County, Tennessee and so pleads in its Complaint.
2. Defendants, Harford Mutual Insurance Company and Firstline National Insurance Company at all times pertinent to this cause of action, were foreign corporations doing business in the State of Tennessee. Defendant Harford is incorporated under the laws of the State of Maryland with its corporate headquarters its principle place of business located at 200 North Main Street, Bel Air, Maryland. Defendant Firstline National Insurance Company is a foreign corporation qualified to do business in the State of Tennessee with its principle place of business located at 200 North Main Street, Bel Air, Maryland and is a subsidiary of The Harford Insurance Companies. Neither Harford Mutual Insurance Company or Firstline National Insurance Company was on April 27, 2011, or any time before

or after said date, up to and include the date this action was filed in the Chancery Court for Knox County, Tennessee, on April 22, 2013, or on the date of the filing of this Notice of Removal, incorporated under the corporate statutes or other applicable law of the State of Tennessee, and have not at any time prior to or subsequent to April 27, 2011, up to and including the date of the filing of this Notice of Removal, had their respective principle places of business in Tennessee, or at any place other than Bel Air, Maryland.

3. The citizenship of the respective parties was the same as herein alleged at the time of the commencement of this action in the Chancery Court for Knox County at Knoxville, Tennessee, and on the date of the filing of this Notice of Removal.

4. On April 22, 2013, Plaintiff instituted an action against both Defendants in the Chancery Court for Knox County at Knoxville, Tennessee, by filing in said Court a Summons and, as the initial pleading, a Complaint requesting that the Court find Defendants liable for property damage resulting from a hail storm on April 27, 2011. Plaintiff seeks from Defendants all amounts required to cover its claims for damages allegedly related to the hail storm, which exceed the \$75,000 jurisdictional limit of this Court, as set forth in the accompanying affidavit of Matthew Moreau (attached as “Exhibit 1”).

5. The Summons and Complaint issuing from the Clerk’s Office of the Chancery Court for Knox County at Knoxville, Tennessee was served upon Defendants on April 26, 2013 through the Tennessee Department of Commerce and Insurance.

6. Less than thirty (30) days have transpired since the Summons and Complaint were received by Defendants, up to and including the date of the filing of this Notice of Removal.

7. Defendants file with this Notice of Removal, marked for identification as “Collective Exhibit 2,” an exact and complete copy of the Complaint and all papers served upon them.

WHEREFORE, Defendants pray that this Court accept this Notice of Removal and proceed with this action in accordance with the law.

**HARFORD MUTUAL INSURANCE COMPANY
and FIRSTLINE NATIONAL INSURANCE
COMPANY**

By: s/S. Morris Hadden
S. Morris Hadden (BPR #000747)

By: s/Caroline R. Williams
Caroline R. Williams (BPR #029454)

Counsel for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on 22nd day of May, 2013, a copy of the foregoing *Notice of Removal* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this filing through the Court's electronic filing system.

s/S. Morris Hadden
S. Morris Hadden (BPR #000747)